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Attorneys for Defendant Bell

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	CASE NO. 2:14-CR-00138-JAD-VCF
Plaintiff,	)	
	)	
vs.	)	
	)	
CHARLES RAY BELL, JR.,	)	
	)	
Defendant.	)	

**STIPULATION TO CONTINUE BRIEFING SCHEDULE ON SENTENCING**  
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between DANIEL BOGDEN, United States Attorney, and PHILLIP N. SMITH, JR., Assistant United States Attorney, counsel for the United States of America, and RUSSELL E. MARSH, ESQUIRE, Wright Stanish & Winckler, counsel for CHARLES RAY BELL, JR., that the Briefing Schedule with respect to filing any Sentencing Memoranda and response be vacated and reset as follows: Sentencing Memoranda shall be filed by August 26, 2016; and any responses are due on or before August 31, 2016.

This stipulation is entered into for the following reasons:

1. Sentencing in this matter is currently scheduled for Tuesday, September 6, 2016, at 10:00 a.m. By Order of the Court dated May 4, 2016 (ECF No. 111), Sentencing Memoranda are due fourteen (14) days before Sentencing, that is, August 23, 2016; and any responses are due seven (7) days before Sentencing, August 30, 2016

2. Defendant Bell has made several written objections to the Presentence Investigation Report ("PSR"). Undersigned defense counsel has spoken with U.S. Probation Officer Leonel

Sanchez. Probation Officer Sanchez had previously estimated that a revised PSR would be prepared by Friday, August 19, 2016. Mr. Sanchez now expects that a revised PSR will be done and distributed to the parties this week, by Friday, August 26, 2016.

3. The parties would like the opportunity to respond to certain matters in the revised PSR in their Sentencing Memoranda. In addition, Defendant Bell's counsel requires additional time to research and prepare Mr. Bell's Sentencing Memoranda.

4. The parties agree that any Sentencing Memoranda would be due on August 26, 2016; and any response on August 31, 2016. The parties will following the usual deadlines under Local Criminal Rule (LCR) 32-1 should the sentencing date be moved. The agreed dates are the same or slightly longer than under the local rules.

5. The Defendant is in custody and agrees to the request in this Stipulation.

DATED: August 23, 2016

WRIGHT STANISH & WINCKLER

DANIEL BOGDEN  
United States Attorney

By /s/ Russell E. Marsh  
RUSSELL E. MARSH, ESQUIRE  
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By /s/ Phillip N. Smith, Jr.  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
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Plaintiff, )  
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vs. )  
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CHARLES RAY BELL, JR., )  
 )  
Defendant. )  
\_\_\_\_\_ )

CASE NO. 2:14-CR-00138-JAD-VCF  
ORDER

Based on the Stipulation of the parties,

**IT IS HEREBY ORDERED** that the current briefing schedule regarding Sentencing be vacated and reset as follows: Sentencing Memoranda shall be on or before August 26, 2016; and responses are due on or before August 31, 2016.

Dated: August 24, 2016.

  
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JENNIFER A. DORSEY  
UNITED STATES DISTRICT COURT JUDGE